

**FILED
SCRANTON**

MAY 30 2018

PER  CLERK

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

_____x

GRAZYNA S. GREZAK,

Plaintiff,

v.

ROPES & GRAY, LLP, et al.,

Defendants

_____x

CIVIL ACTION

No. 3:15-CV-2111

(MANNION, D.J.)

(MEHALCHICK, M.J.)

MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO THE HONORABLE
MEHALCHICK, UNITED STATES MAGISTRATE JUDGE' re184 REPORT AND
RECOMMENDATIONS

Plaintiff, Grazyna Grezak, respectfully submits this Request supported by
Declaration for extension of time to file her Objections to the Honorable
Mehalchick, United States Magistrate Judge's re 184 Order "Report and
Recommendations".

As the record of this case shows on the Docket No. 24, Plaintiff was severely
intimidated for filing this case on November 3, 2015 with this Court.

From August 19, 2016 until December 05, 2016 Plaintiff was continuously intimated for not withdrawing this case.

On December 5, 2016, this Court gave Plaintiff 30 days to file her Amended Complaint.

On January 5, 2017, Plaintiff came to this Court covering bruises on her face with big scarf and submitted unfinished Third Amended Joint Complaint against multiple Defendants.

Due to the unique circumstances of this pending case and the prolonged extraordinary circumstances surrounding this case in the District Court for the Middle District of Pennsylvania, from January 5, 2017 until now, involving such inhumane treatments and intimidation of unrepresented Polish Cristian women Plaintiff, and sick Plaintiff will be severely prejudiced by only 14 days given to her by Local Rules to respond the re 184 Order dismissing her such hard work in the form of many documents proving her requests to the Court, and supporting her claims against multiple Defendants to this case, in amount of five (5).

It is clear from the Court's information, evidencing documents in the record of the case, that Plaintiff is very sick, having proven by evidence, problems with walking, driving the car and writing on many occasions, because she can't effort proper medications and treatments necessary to proceed on time against multiple Defendants surrounded by plenty attorneys.

And the only fourteen (14) days will potentially cause irreparable harm to injured Plaintiff combined with the extraordinary circumstances here of

continued financial harm and physical injury of unrepresented Plaintiff during pendency of this case, that she is unable to retain her own attorney.

Thus, the Plaintiff's request is reasonable here to be given additional time to respond to the re 184 Order on Report and Recommendations against multiple Defendants here.

The re 177 Affidavit evidence in the record of this case shows, that Defendant Aisha Bams and Ropes & Gray, LLP intentionally, knowing Plaintiff' vulnerability, harassed her, in violation of her rights during this pending Third Amended Joint Complaint.

Plaintiff was working hard to improve her physical condition and Defendant Aisha Bams and Ropes & Gray, LLP intentionally victimized fearful Plaintiff. And now, Plaintiff is struggling again with painful muscle spasms, painful deformation of her fingers.

Due to the relevant circumstances surrounding Plaintiff's ongoing lateness in filings against multiple Defendants, she is entitled to certain "fundamental" constitutional protection in the form of reasonable time for her to properly respond to re 184 Order Report and Recommendations.

There is no danger of prejudice to the opposing parties here, and no potential impact on judicial proceedings. There is nine (9) months past already proceeding on the Third Amended Joint Complaint, and additional time for sick Plaintiff here to responded to Report and Recommendations will not cause any prejudice.

Plaintiff will work hard in good faith to cut the length of delay to respond to re Order on Report and Recommendations, even it is not within the control of Plaintiff.

WHEREFORE, for the foregoing reasons, Plaintiff Grazyna Grezak respectfully requests this Honorable Court for extension of time to file her Objections to Magistrate Judge' Report and Recommendation.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Grazyna Grezak", is written over a horizontal line.

Grazyna Grezak

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(201) 681 0076

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Date: May 29, 2018

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

_____X

Grazyna S Grezak,

Plaintiff,

No. 3:15-CV-2111

v.

Ropes & Gray, LLP, et al.,

(Mannion, D.J.)

Defendants

(Mehalchick, M.J.)

_____X

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on 5.29, 2018, I served via U.S. mail a true and correct copy of Plaintiff Motion for Extension of Time to File Objections to the Honorable Mehalchick, United States Magistrate Judge's 184 Report and Recommendations

Upon all Defendants to this case addressed as follow:

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